IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

CLIFFORD F. TUTTLE, JR.,	§	
REPRESENTATIVE OF THE ESTATE OF	§	
DENNIS W. TUTTLE, DECEASED, ROBERT	§	
TUTTLE, AND RYAN TUTTLE,	§ §	
	§	
Plaintiffs	§	
	§	
V.	§	Civil Action No. 4:21-cv-00270
	§ § §	
CITY OF HOUSTON, et al.,	§	
	§	
Defendants.	§	
	AND	
PATRICIA NICHOLAS, as temporary	§	
Administrator of the Estate of Rhogena Nicholas	§	
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an	§ §	
Administrator of the Estate of Rhogena Nicholas	§ § §	
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an	§ § §	
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an an heir of the Estate of Rhogena Nicholas,	\$ \$ \$ \$ \$ \$ \$	
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an	\$ \$ \$ \$ \$ \$ \$ \$	
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an an heir of the Estate of Rhogena Nicholas,	\$ \$ \$ \$ \$ \$ \$	
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an an heir of the Estate of Rhogena Nicholas,	***	Civil Action No. 4:21-cv-00272
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an an heir of the Estate of Rhogena Nicholas, Plaintiffs v.	***	Civil Action No. 4:21-cv-00272
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an an heir of the Estate of Rhogena Nicholas, Plaintiffs	***	Civil Action No. 4:21-cv-00272
Administrator of the Estate of Rhogena Nicholas and JO ANN NICHOLAS, individually and as an an heir of the Estate of Rhogena Nicholas, Plaintiffs v.	\$ \$ \$ \$ \$ \$ \$	Civil Action No. 4:21-cv-00272

NOTICE OF FILING DEPOSITION PROFFERS

Plaintiffs file this Notice of the filing the deposition proffers of Son Nguyen, Art Acevedo, Cedelle Lovings (Vol. 1 and 2), Erik Termeulen, Gerald Goines, Isaac Duplehcain, Jonathan French, M. Beynon M.D., Nadeedm Ashraf, and Paul Follis.

/s/ Michael Doyle

Michael Patrick Doyle
Patrick M. Dennis
Jeffrey I. Avery
Patrick Doyle
DOYLE DENNIS AVERY LLP
The Clocktower Building
3401 Allen Parkway, Suite 100
Houston, Texas 77019
Email: service@doylelawfirm.com

CHARLES C. BOURQUE, JR. Admitted Pro Hac Vice
ST. MARTIN & BOURQUE, LLC
315 Barrow St.
Houma, LA 70360
985-876-3891 (phone)
985-851-2219 (fax)
cbourque@stmblaw.com

Attorneys for the Nicholas Family

/s/ Boyd Smith

Michael T. Gallagher L. Boyd Smith, Jr. Pamela R. McLemore 2905 Sackett Street Houston, TX 77098 Telephone: (713) 238-7705 Facsimile: (713) 238-7852 mike@gld-law.com bsmith@gld-law.com pamm@gld-law.com

Attorneys for the Tuttle Family

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing document was forwarded to the following counsel of record on this the 25th day of October, 2024 via CM/ECF, hand delivery, electronic mail, overnight courier, U.S. Mail, certified mail, return receipt request, or facsimile, pursuant to the Federal Rules of Civil Procedure.

/s/ Jeffrey I. Avery
Jeffrey Avery